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8 *Attorneys for Defendant, Conn Appliances, Inc.*

6 **UNITED STATES DISTRICT COURT**  
7 **DISTRICT OF NEVADA**

8 BOBBIE DARNELL,

9 Plaintiff,

10 vs.

11 EQUIFAX INFORMATION SERVICES, LLC;  
12 EXPERIAN INFORMATION SOLUTIONS,  
13 INC.; SOUTHERN CALIFORNIA EDISON  
14 COMPANY; SNAP-ON CREDIT, LLC;  
15 CONN APPLIANCES, INC.; and PAC AUTO  
16 FINANCE,

Defendants.

Case No.: 2:21-cv-01007-APG-NJK

**JOINT MOTION TO EXTEND  
DEADLINE TO RESPOND TO  
PLAINTIFF'S COMPLAINT (FIRST  
REQUEST)**

17 Plaintiff, Bobbie Darnell ("Plaintiff"), and Defendant, Conn Appliances, Inc. ("Conn")  
18 (collectively "Parties"), by and through their counsel of record, hereby stipulate and agree as  
19 follows:

20 On May 26, 2021, Plaintiff filed his Complaint [ECF No. 1]. Conn was served with  
21 Plaintiff's Complaint on May 27, 2021. The deadline for Conn to respond to Plaintiff's Complaint  
22 is June 17, 2021. The Parties have discussed extending the deadline for Conn to respond to  
23 Plaintiff's Complaint to allow for better investigation of the allegations and discuss possible  
24 resolution of the matter.

25 WHEREAS, the Parties hereby stipulate and agree to extend the deadline for Conn to file  
26 their responsive pleading to Plaintiff's Complaint to July 19, 2021.

27 This is the first motion for an extension of time for Conn to file their responsive pleading.  
28 The extension is requested in good faith and is not for purposes of delay or prejudice to any other

1 party.

2 As part of this motion, Conn agrees to participate in any Rule 26(f) conference that occurs  
3 during the pendency of this extension.

4 DATED this 16th day of June, 2021.

5  
6 WRIGHT, FINLAY & ZAK, LLP

KIND LAW

7 /s/ Ramir M. Hernandez

/s/ Michael Kind

8 Ramir M. Hernandez, Esq.

Michael Kind, Esq.

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10 *Attorneys for Defendant, Conn Appliances,*  
11 *Inc.*

*Attorneys for Plaintiff, Bobbie Darnell*

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15 IT IS SO ORDERED:

16   
17 \_\_\_\_\_  
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: June 17, 2021  
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